

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

Jane Doe,

Plaintiff,

v.

Limestone University f/k/a Limestone College,
Collins Murphy, MG Freesites, LTD. d/b/a
Pornhub.com and Hammy Media. Ltd d/b/a
Hamster.com

Defendants.

Civil Action No.: 7:21-cv-03193-JD

**DEFENDANT COLLINS MURPHY'S
ANSWERS TO LOCAL RULE 26.01
INTERROGATORIES**

NOW COMES Defendant Collins Murphy, (hereinafter "Defendant") by and through his undersigned counsel, and pursuant to Local Civil Rule 26.01, states as follows:

(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

ANSWER: None to Defendant's knowledge.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

ANSWER: Plaintiffs request a jury trial and Defendant does not dispute such request.

(C) State whether the party submitting these responses is a publicly-owned company and separately identify (1) any parent corporation and any publicly-held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly owned company of which it is a parent; and (3) each publicly owned company in which the party owns ten percent (10%) or more of the outstanding shares.

ANSWER: Not applicable.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

ANSWER: Plaintiffs filed suit in this Division and Defendant does not dispute the same because, upon information and belief, the location where the alleged incident occurred is within the Spartanburg Division.

(E) Is this action related in whole or in part to any other matter filed in this district whether civil or criminal? If so, provide (1) a short caption and full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action.

ANSWER:

**(1) Jane Does 1-9 v. Collins Murphy, et al.
Case No.: 7:20-CV-00947-TMC**

**Arnette et al v. Limestone College, et al.
Case No.: 7:20-CV-04260-JD**

(2) All three cases originate from the same factual allegations against Collins Murphy and Limestone College.

(3) Jane Does 1-9: Amended Conference and Scheduling Order was filed August 4, 2021. Discovery shall be completed no later than October 24, 2022. Mediation shall take place on or before July 1, 2022. Trial not before date is November 30, 2022. Presently Defendants have multiple motions in opposition of Plaintiffs' Fourth Motion to Amend filed on November 9, 2021.

Arnette: Plaintiffs filed their Third Amended Complaint September 29, 2021. Second Amended Conference and Scheduling Order was filed August 13, 2021. Order granting Consent Motion to Extend Deadline for Identification of Plaintiffs' Expert(s) extended to March 31, 2022 was entered January 20, 2022. Discovery deadline is May 6, 2022. Mediation deadline is May 6, 2022. Trial not before date is September 9, 2022.

(F) [Defendants only.] If the defendant is improperly identified, give the proper

identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER: Defendant is properly identified.

(G) [Defendants only.] If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

ANSWER: Not applicable.

HALL, BOOTH, SMITH, P.C.

/s/ Alan Belcher

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This 24th day of February , 2022